

EXHIBIT B

Azman Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
TERRAFORM LABS PTE. LTD., ¹)	Case No. 24-10070 (BLS)
)	
Debtor.)	
)	

**DECLARATION OF DARREN AZMAN IN SUPPORT OF APPLICATION
OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
TERRAFORM LABS PTE. LTD. TO RETAIN AND EMPLOY McDERMOTT
WILL & EMERY LLP AS COUNSEL, EFFECTIVE FEBRUARY 29, 2024**

I, Darren Azman, declare as follows:

1. I am a partner of the firm of McDermott Will & Emery LLP (“McDermott” or the “Firm”). McDermott maintains offices at, among other places, One Vanderbilt Avenue, New York, New York 10017, and The Brandywine Building, 1000 N. West Street, Suite 1400, Wilmington, Delaware 19801. I am a member in good standing of the Bars of the States of New York and Massachusetts, and I have been admitted to practice in the U.S. Courts of Appeals for the Second and Third Circuits, and the U.S. District Courts for the District of Massachusetts and the Eastern and Southern Districts of New York. There are no disciplinary proceedings pending against me.

2. I am familiar with the matters set forth herein and make this Declaration in support of the application (the “Application”)² of the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”) of Terraform

¹ The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

² Capitalized terms that are used but not defined herein shall have the meanings ascribed to such terms in the Application.

Labs Pte. Ltd. (the “Debtor”) for the approval of the Committee’s retention and employment of McDermott as counsel in connection with the Chapter 11 Case, effective February 29, 2024.

3. On February 29, 2024, under section 1102 of title 11 of the United States Code (the “Bankruptcy Code”), the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee. *See* Docket No. 101. The Committee currently comprises: (a) Celsius Network LLC, c/o Litigation Oversight Committee; (b) Josh Golder; and (c) Francisco Javier Reina Barragan. On February 29, 2024, the Committee selected McDermott to serve as the Committee’s counsel in connection with the Chapter 11 Case, subject to the Court’s approval.

4. In preparing this Declaration, through my colleagues, I submitted to McDermott’s computerized client and conflict database (the “Conflict Database”) the names set forth on a list of parties-in-interest identified by the Debtor and additional parties identified by McDermott, which include: (a) the Debtor; (b) known non-Debtor affiliates; (c) the Debtor’s directors and officers; (d) the Debtor’s holders of 5% or more of its equity; (e) Committee members; (f) bankruptcy professionals; (g) ordinary course professionals; (h) employee indemnification counsel; (i) other professionals and legal parties; (j) banks, lenders, lien parties, and administrative agents; (k) insurers; (l) taxing, governmental, and regulatory authorities; (m) top unsecured creditors; (n) contact counterparties; (o) vendors; (p) investments; (q) the U.S. Trustee and key staff members; and (r) the judges in the Delaware Bankruptcy Court and certain Court personnel. The list of the parties searched by McDermott is attached hereto as **Schedule 1** (collectively, the “Searched Parties”).

5. The Conflict Database maintained by McDermott is designed to include every matter on which the Firm is now and has been engaged, by which entity the Firm is now or has

been engaged, and, in each instance, the identity of certain related parties and adverse parties and certain of the attorneys in the Firm that are knowledgeable about the matter. It is the policy of McDermott that no new matter may be accepted or opened within the Firm without completing and submitting to those charged with maintaining the Conflict Database the information necessary to check each such matter for conflicts, including the identity of the prospective client, the matter, and related and adverse parties. Accordingly, McDermott maintains and systematically updates this system in the regular course of business of the Firm, and it is the regular practice of the Firm to make and maintain these records.

Representation of Parties-in-Interest

6. To the extent that I have been able to ascertain that McDermott has been retained within the last three years to represent any of the Searched Parties in matters unrelated to these chapter 11 cases, such facts are disclosed on Schedule 2 attached hereto.³ In connection with the services to be rendered to the Committee, McDermott will not commence a cause of action against any Current Client with respect to the Chapter 11 Case, unless McDermott has received a waiver from the Current Client allowing McDermott to commence such an action. In connection with the Chapter 11 Case, to the extent any causes of action are commenced by or against any Current Client, and a waiver letter is not obtained permitting McDermott to participate in such action, the Committee will retain conflicts counsel to represent the interests of the Debtor's unsecured creditors.

³ As referenced in Schedule 2, the term "current client" (the "Current Clients") means a client to whom time was posted in the 12 months preceding February 29, 2024, the date the Committee selected McDermott as its proposed counsel (the "Retention Date"); the term "former client" means a client to whom time was posted between 12 and 36 months preceding the Retention Date, but for whom no time has been posted in the 12 months preceding the Retention Date; and the term "closed client" means a client to whom time was posted in the 36 months preceding the Retention Date, but for which the client representation has been closed. As a general matter, McDermott discloses connections with former clients or closed clients for whom time was posted in the last 36 months, but does not disclose connections if time was billed more than 36 months before the Retention Date.

No Connections with Parties Representing One Percent or More of McDermott's Revenues for 2021, 2022, or 2023

7. At the inception of each engagement for which a declaration is required under Bankruptcy Rule 2014, McDermott reviews the information relating to the parties involved in a bankruptcy case to determine whether any such party, together with its known related entities, were clients of McDermott and, as a result, made payments to McDermott for services rendered in the calendar year prior to the date of review that in the aggregate for each such party exceed one percent of McDermott's total revenues for such calendar year. In connection with this Declaration, McDermott has reviewed similar information for the years 2021, 2022, and 2023.

8. McDermott's revenues for services rendered on behalf of each of the parties-in-interest identified in Schedule 2 aggregate, with respect to each such party-in-interest, less than one percent of McDermott's annual revenue in each of calendar years 2021, 2022, and 2023.

Connections with the Debtor

9. McDermott has not represented the Debtor.

10. McDermott in the past has represented parties potentially adverse to the Debtor in matters wholly unrelated to the Chapter 11 Case.

Specific Disclosures

11. Okcoin Technology Company Limited. Terraform Labs Pte. Ltd. sought information from a third-party, Okcoin Technology Company Limited ("OTCL"), in the form of a letter of request. An action was filed in Hong Kong concerning that letter of request (the "Hong Kong Proceeding"). Clifford Chance represents OTCL in connection with the Hong Kong Proceeding. In connection with the Hong Kong Proceeding, Clifford Chance hired Andrew B. Kratenstein (a McDermott partner) to provide a foreign legal expert report concerning the status of *SEC v. Terraform Labs Pte. Ltd., et al.*, No. 23-cv-13460 (S.D.N.Y.)

(the “Terraform Litigation”), based solely on public information and certain issues of U.S. civil procedure. Out of an abundance of caution, Mr. Kratenstein has been screened from McDermott’s representation of the Committee in the Chapter 11 Case. McDermott does not represent OTCL as counsel in the Hong Kong Proceeding or in the Terraform Litigation. Although McDermott represents Okcoin USA Inc. (an entity related to OTCL) in unrelated matters, McDermott will not represent Okcoin USA Inc. or any affiliated entity in any matter related to the Debtor or the Chapter 11 Case during the pendency of the Chapter 11 Case.

12. Celsius Network LLC. As noted above, Celsius Network LLC is a member of the Committee. McDermott represents certain creditors in the chapter 11 cases of Celsius Network LLC, *et al.*, Case No. 22-10964 (MG) (Bankr. S.D.N.Y.). Specifically, McDermott represents (i) the Plan Administrator (the “Plan Administrator”) appointed in the chapter 11 cases of Voyager Digital Holdings, Inc., *et al.*, Case No. 22-10943 (MEW) (Bankr. S.D.N.Y.), and (ii) the Cred Inc. Liquidation Trust (the “Cred Trust”) formed in the chapter 11 cases of Cred Inc., *et al.*, Case No. 20-12836 (JTD) (Bankr. D. Del.). McDermott’s representation of the Plan Administrator and Cred Trust do not relate in any way to the Debtor or the Chapter 11 Case, and McDermott will not represent either entity in any matter related to the Debtor or the Chapter 11 Case during the pendency of the Chapter 11 Case.

13. Cristian Catanese. McDermott associate Cristian Catanese formerly clerked for the Honorable Brendan Linehan Shannon, the judge assigned to the Chapter 11 Case, but left his position at the Court more than six months prior to the date of this Declaration.⁴

⁴ The Court’s *Conflict of Interest Policies for Law Clerks* provides that “[o]nce a law clerk leaves the Court, for a period of six months the law clerk shall not appear in court before any Judge for whom he/she clerked.”

Other Connections and General Disclosures

14. McDermott performed general diligence to determine any connections beyond what is disclosed in the attached schedules. McDermott may have represented in the past and/or currently or in the future may represent entities (other than parties in the attached schedules) not known currently to McDermott in matters wholly unrelated to the Chapter 11 Case who may be parties-in-interest in the Chapter 11 Case. To the extent that McDermott discovers any such information or needs to update the information disclosed herein, McDermott will disclose such information by filing a supplemental declaration in accordance with Bankruptcy Rule 2014.

15. Certain entities owned by current or former McDermott attorneys and senior staff (“Attorney Investment Entities”) have investments in funds or companies that may, directly or indirectly, be affiliated with the Debtor or one or more of its creditors, hold investments in the debt or equity securities of the Debtor or one or more of its creditors, may be adverse to the Debtor or one or more of its creditors, or conduct commercial transactions with the Debtor or one or more of its creditors (each, a “Passive Holding”). The Attorney Investment Entities are passive and have no management or other control rights in such funds or companies. Notwithstanding this, other persons may in the future assert that a Passive Holding creates, in certain circumstances, a conflict between McDermott’s exercise of its independent professional judgment in rendering advice to the Committee and the financial interest of McDermott attorneys participating in the Attorney Investment Entities, and such other persons might seek to limit the Committee’s ability to use McDermott to advise the Committee on a particular matter. While McDermott cannot control what a person might assert or seek, McDermott believes that McDermott’s judgment will not be compromised by virtue of any Passive Holding.

16. From time to time, McDermott's partners, counsel, associates, and employees may personally directly acquire a debt or equity security of the Debtor or a company which may be (or become) one of the Debtor's creditors or other parties-in-interest in the Chapter 11 Case. McDermott has a long-standing policy prohibiting attorneys and employees from using confidential information that may come to their attention in the course of their work. In this regard, all of McDermott's attorneys and employees are barred from trading in securities with respect to which they possess confidential information.

17. None of McDermott's representations of creditors or other parties-in-interest who are involved in the Chapter 11 Case comprise a material component of McDermott's practice, nor does McDermott currently represent such parties on any issue relating to the Chapter 11 Case.

Affirmative Statement of Disinterestedness

18. Based on the conflicts search conducted to date and described herein, to the best of my knowledge and insofar as I have been able to ascertain, (a) McDermott does not hold or represent any interest adverse to the interest of the Debtor's estate with respect to the matters on which McDermott is to be employed, (b) McDermott is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, (c) McDermott does not represent any other entity having an adverse interest in connection with the Chapter 11 Case, except as permitted under section 1103(b) of the Bankruptcy Code, and (d) McDermott has no connection with the Debtor, its creditors, or any other party-in-interest, their respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the same, or any judge in the United States Bankruptcy Court for the District of Delaware, except as disclosed or otherwise described herein.

Compensation

19. McDermott is willing to be employed by the Committee as its counsel and will make appropriate applications to the Court for compensation and reimbursement of out-of-pocket expenses, all in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any applicable orders of the Court. The current hourly rates that McDermott charges for the services of professionals and paraprofessionals employed in its U.S. offices are:

<u>Billing Category</u>	<u>Range</u>
Partner	\$1,325 – \$2,875
Senior Counsel	\$1,050 – \$2,240
Employee Counsel	\$1,100 – \$1,985
Associate	\$765 – \$1,350
Staff Attorney	\$440 – \$965
Paraprofessional	\$285 – \$835

20. The names, positions, and applicable hourly rates of McDermott's attorneys and paralegals that are expected to have primary responsibility for providing services to the Committee are as follows:

<u>Attorney or Paralegal</u>	<u>Position Department</u>	<u>Hourly Rate</u>
David R. Hurst	Partner Corporate Advisory	\$1,750
Darren Azman	Partner Corporate Advisory	\$1,650
Joseph B. Evans	Partner FinTech & Blockchain	\$1,650
Gregg A. Steinman	Partner Corporate Advisory	\$1,475

Lucas B. Barrett	Associate Corporate Advisory	\$1,245
Joshua Yim	Associate FinTech & Blockchain	\$1,200
Carmen M. Dingman	Associate Corporate Advisory	\$1,155
William W. Hameline	Associate Litigation	\$1,040
Dante S. Pavan	Associate Corporate Advisory	\$925
Cristian P. Catanese	Associate Corporate Advisory	\$925
Aristotle Mannan	Associate FinTech & Blockchain	\$805
Carson Masenthin	Associate FinTech & Blockchain	\$805
Jess Wisniewski	Associate Litigation	\$805
Gabrielle M. Albert	Staff Attorney FinTech & Blockchain	\$610
Nolley Rainey	Paralegal Corporate Advisory	\$500

In addition to the attorneys and paralegals named above, I expect that it may be necessary during the Chapter 11 Case for other McDermott professionals, including those in other legal disciplines, to provide services to the Committee.

21. The foregoing hourly rates are subject to periodic increase (typically effective as of January of each year) in the normal course of McDermott's business. These rates are set at a level designed to compensate McDermott fairly for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. McDermott operates in a complicated, national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, their area of specialization, the Firm's expertise, performance, and reputation, the nature of the work involved, and other factors.

22. is McDermott's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. McDermott will charge for expenses in a

manner and at rates consistent with charges made generally to its other clients in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court. Such expenses include, among other things, mail and express mail charges, special or hand delivery charges, travel expenses, expenses for computerized research, and transcription costs.

23. No agreement exists, nor will any be made, to share any compensation received by McDermott for its services with any other person or firm other than partners and other attorneys of McDermott.

Statement Regarding the U.S. Trustee Guidelines

24. McDermott will apply for compensation for all professional services performed and reimbursement of all expenses incurred in accordance with sections 330(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Rule 2016-2, and any applicable orders of the Court.

25. McDermott also intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in Appendix B – Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases (the “U.S. Trustee Guidelines”), which became effective on November 1, 2013, in connection with both the Application and any interim or final fee applications that McDermott files in the Chapter 11 Case.

26. Further, consistent with the U.S. Trustee Guidelines:

- (a) McDermott has not agreed to a variation of its standard or customary billing arrangements for this engagement, except as disclosed herein;
- (b) none of McDermott's professionals included in this engagement have varied their rates based on the geographic location of the Chapter 11 Case;

- (c) McDermott did not represent the Committee before the Petition Date; and
- (d) McDermott expects to develop a budget and staffing plan to comply with the U.S. Trustee's requests for information and additional disclosures, and any orders of the Court. Recognizing that unforeseeable fees and expenses may arise in large chapter 11 cases, McDermott may need to amend the budget as necessary to reflect changed circumstances or unanticipated developments.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: March 28, 2024

By: */s/ Darren Azman*

Darren Azman
Partner
McDermott Will & Emery LLP

SCHEDULE 1

Searched Parties

1. Debtor

Terraform Labs Pte. Ltd.

2. Known Affiliates (Non-Debtor Joint Ventures)

Moon Landing Venture I Ltd
Proximity Panorama, LDA
Terra Form Labs Korea
Terraform Labs Limited

3. Directors and Officers

Amani, Arrash Chris
Brown, Michael
Dubel, John
Mathialagan, Ashwin

4. 5% Or More Equity Holders

Kwon, Do Hyeong
Shin, Daniel Hyunsung

5. Committee Members

Celsius Network LLC, c/o Litigation Oversight Committee
Josh Golder
Francisco Javier Reina Barragan

6. Bankruptcy Professionals

Alvarez and Marsal
Epiq Global
Richards, Layton & Finger, P.A.
Weil, Gotshal & Manges LLP
McDermott Will & Emery LLP
Force Ten Partners LLC
Genesis Credit Partners LLC
Stout Risius Ross, LLC

7. Ordinary Course Professionals

Benesch Friedlander Coplan & Aronoff, LLP
Collas Crill
Conyers
Elliott Kwok Levine & Jaroslaw LLP
Gasser Partner
Howse Williams
Kim & Chang
Rahman Ravelli Solicitors Ltd.
Rui Pena, Arnaut & Associados

8. Employee Indemnification Counsel

Doug Whitney Law Offices LLC
Goodwin Law
Kobre & Kim
McGuireWoods
Reed Smith

9. Other Professionals

Dentons Cayman Islands
Dentons Frankfurt
Dentons Mauritius
Dentons Paris
Dentons Rodyk & Davidson LLP
Dentons Seoul
Dentons US LLP
WongPartnership LLP

10. Legal Parties

Beltran, Hulian Moreno
Clifford Chance
Drew & Napier LLC
Gan Yi Dong, Douglas
Kaplan Kecker Fink
Mishcon de Reya LLP
Platias, Nikolaos Alexandros
Setia Law LLC

11. Banks/Lenders/UCC Lien Parties/Administrative Agents

Aspire Bank
CIMB Bank
DBS Bank
Sygnum Bank
Hex Technologies Limited aka Hex Trust Limited
Volopay
Western Alliance Bank

12. Insurance

AIG Asia Pacific Insurance Pte. Ltd.
Relm Insurance

13. Taxing Authority/Governmental/Regulatory

California Employment Development Department
Commodity Futures Trading Commission
Hawaii Department of Taxation
High Court of Singapore
Internal Revenue Services
Ministry of Finance
U.S. Department of Justice
Washington Department of Revenue

14. Top General Unsecured Creditors

Aca Engrg Pte Ltd
Archer Marketing & Development (S) Pte Ltd
Cheang & Lee Sanitary Plumbing Pte Ltd
Cloudflare, Inc.
EShares, Inc. dba Carta, Inc.
K&L Gates LLP
Lee, Ethan

Nansen Pte. Ltd
Omnicom Group Inc.
OKCoin Technology Company Ltd.
Pagerduty, Inc.
Securities and Exchange Commission
Singtel
Standard Crypto Venture Fund
SubMC1
Token Terminal OY
TPC Commercial Pte Ltd
TQ Ventures III LP
Wintermute Trading

15. Contract Counterparties

8C Management LLC
Ademco Far East Pte Ltd
Adobe Inc.
Alles Labs Pte Ltd
Amazon Web Services Singapore
Amber Technologies Limited
Anticimex Pest Management Pte Ltd
Ape Board Pte Ltd
Atoz SG Accounting Pte Ltd
BFXWW Inc aka Bitfinex
Big Labs S.R.L. Semplificata
Binance Capital Management Co., Ltd
Bitmonex LLC
Bitrue Singapore Pte Ltd
Breadnbeyond
Breeze Labs, Inc
BTBlock
Bugcrowd Inc.
Centrodex Engineering Pte Ltd
Certik, LLC
Chaos Labs, Inc
Circle Internet Services, Inc., dba Circleci
Civilized Discourse Construction Kit, Inc aka Discourse
Coinbase Custody Trust Company, LLC
Concentric Advisors Inc.
Concept Art House, Inc. aka CAH
Confio GmbH
Cornerstone Research
Crystal Net Pte Ltd
DDC Advocacy LLC dba DDC Public Affairs aka OmnicomPRGroup
Deel, Inc
Delphi Labs Global Partners LLP
Docusign Inc
Dubel & Associates, LLC
Ecology Limited
Enterprise Management Pte Ltd
Falconx Limited

Gitbook Inc
Github, Inc.
Google Asia Pacific Pte. Ltd.
Hashicorp, Inc.
Hex Technologies Limited aka Hex Trust Limited
Jones Lang Lasalle Property Consultants Pte Ltd
Luna Foundation Guard Ltd.
Marte Consulting Pty Ltd Trading As “SCV-Security”
Moon Rabbit Labs, Inc.
SCV-Security
Slack Technologies Limited
Tai Mo Shan Limited
Tips & Tricks, LLC

16. Vendors

Alpha Consulting
Air Charter Service
Amazon Web Services Korea
Attorney Translation
Capital Process Servers
Central Provident Fund Board (CPF)
DDC Advocacy LLC
Dentons Lee
Douglas E. Whitney
EcoSense Solutions Pte Ltd
Eldric Marketing Pte Ltd
Expensify
Fidelity Investments
Freeh
Gradillas Partners Investigation
J.S. Held LLC
Law Firm Planet
Le Yu Corporate Advisory Pte Ltd
Lin Xiufang (Cleaner)
Lincoln Financial Group
Lindeborg Counsellors At Law Ltd
Manulife Financial Corporation
MyRepublic Broadband Pte Ltd
Parcels, Inc.
Project Solutions Pte Ltd
Quinlan Partners
Shobna Chandran
SP Group Ltd
Tan Rajah & Cheah
Tower Legal Solutions
VSP Vision
Xiufang, Lin

17. Investments

1KX, LP
Arvin Buraat NBFI aka XGround Inc

Authlayer Inc. aka Zefi
Avalanche (BVI), Inc aka Avax
Best Home Real Estate LLC
Blockpour Pte. Ltd.
Build Republic Inc
CoinAlpha, Inc. / Hummingbot Foundation
Defi Alliance Delaware Feeder LLP
Defi Limited
Flipside Crypto, Inc.
Global Maiden International Limited
Hex Capital Group Limited
HOF Capital Growth Opportunity XX, LLC
Hyphen Labs Ltd
Liquality Inc.
Mariana Layer Labs Ltd
Megashots Internet Private Limited
Miami Labs Inc
NPixel Pte. Ltd
OPY League Pte. Ltd.
Outlet Finance Inc.
Pangea Cayman Fund I Ltd.
Parafi Digital Opportunities International LP
Persistence Enterprise Solutions Pte Ltd
Persistence Technologies (BVI) Pte Ltd
Qredo Ltd
Registered Agents Inc
Rift Technologies Limited
Sha2 Labs Pte Ltd
Stazon Technologies Ltd aka Stader Labs
Superplastic Inc. & Mighty Elephant
Three Arrow Fund, Ltd
Translucence Research, Inc.
Trustless Media Inc
Vaneck ETP Ag
Wandilla Holdings Limited

18. U.S. Trustee and Staff

Attix, Laruen
Bu, Fang
Casey, Linda
Clausen, Joanne E.
Cudia, Joseph
Dice, Holly
Dortch, Shakima L.
Fox, Timothy J. Jr.
Giordano, Diane
Green, Christine
Hackman, Benjamin
Jones, Nyanquoi
Leamy, Jane
Lipshie, Jonathan

McCollum, Hannah M.
McMahon, Joseph J.
O'Malley, James R.
Panacio, Michael
Richenderfer, Linda
Schepacarter, Richard
Serrano, Edith A.
Sierra-Fox, Rosa
Thomas, Elizabeth
Vara, Andrew R.
Wynn, Dion

19. Judges and Staff

Chan, Ashely M., Judge
Dorsey, John T., Judge
Goldblatt, Craig T., Judge
Horan, Thomas M. Judge
Owens, Karen B., Judge
Shannon, Brendan Linehan
Silverstein, Laurie Selber, Chief Judge
Stickles, J. Kate, Judge
Walrath, Mary F., Judge
Barksdale, Nickita
Batts, Cacia
Bello, Rachel
Brady, Claire
Capp, Laurie
Cavello, Robert
Farrell, Catherine
Gadson, Danielle
Haney, Laura
Hrycak, Amanda
Johnson, Lora
Lopez, Marquietta
Lugano, Al
O'Boyle, Una
Ranieri, Joan
Subda, Paula
Walker, Jill
Yeager, Demitra

SCHEDULE 2

Current, Former, and Closed Clients

Current¹ Clients²

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is a McDermott Client
AIG Asia Pacific Insurance Pte. Ltd.	AIG Europe SA
Alvarez and Marsal	A&M Capital Advisors, LP fka Alvarez and Marsal; Alvarez & Marsal Holdings, Inc.
Amazon Web Services Singapore	Amazon.com and its affiliates, including Amazon Web Services Singapore
Amazon Web Services Korea	Amazon.com and its affiliates, including Amazon Web Services Korea
BFXWW Inc aka Bitfinex	BFXWW Inc aka Bitfinex
Coinbase Custody Trust Company, LLC	Coinbase Inc. and its affiliates, including Coinbase Custody Trust Company, LLC
DBS Bank	DBS Bank Limited; DBS Bank (Taiwan) Ltd.
Dentons US LLP Dentons Rodyk & Davidson LLP Dentons Cayman Islands Dentons Frankfurt Dentons Mauritius Dentons Paris Dentons Seoul	Gadens; Dentons Patent Attorneys Australasia Limited
Fidelity Investments	Fidelity Investments
Goodwin Law	Goodwin Procter (UK) LLP
Google Asia Pacific Pte. Ltd.	Google Inc. and its affiliates
J.S. Held LLC	J.S. Held LLC
Jones Lang Lasalle Property Consultants Pte Ltd	LaSalle Investment Management, Inc.; Jones Lang LaSalle Americas, Inc.
Kim & Chang	Kim & Chang

¹ The term “current client” means a client to whom time was posted in the 12 months preceding February 29, 2024, the date that the Committee selected McDermott as its proposed counsel.

² McDermott may currently represent or have previously represented certain affiliates of the entities disclosed herein, and the disclosure is accordingly broad in scope.

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is a McDermott Client
Ministry of Finance	China Taiping Insurance (UK) Co Ltd., a subsidiary of the Ministry of Finance of China; Joonko Diversity Inc., a subsidiary of the Ministry of Finance of Singapore; PTT Public Company Limited, whose majority investor in the Ministry of Finance of Thailand
OKCoin Technology Company Ltd.	Okcoin USA Inc.
Omnicom Group Inc.; DDC Advocacy LLC d/b/a DDC Public Affairs aka OmnicomPRGroup	Omnicom Group, Inc.; Stein Promotions GmbH
Stout Risius Ross, LLC	Stout Risius Ross, LLC

Former¹ Clients

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that was a Former McDermott Client
Conyers	Conyers Trust Company (Bermuda) Limited
Dentons US LLP Dentons Rodyk & Davidson LLP Dentons Cayman Islands Dentons Frankfurt Dentons Mauritius Dentons Paris Dentons Seoul	Dentons Cohen & Grigsby; Dentons Europe AO
Epiq Global	Epiq Systems Germany GmbH
Manulife Financial Corporation	Manulife Infrastructure Fund II, L.P.
Ministry of Finance	Japan Post Bank Co., Ltd., a subsidiary of the Ministry of Finance Japan

¹ The term “former client” means a client to whom time was posted between 12 and 36 months preceding February 29, 2024, the date that the Committee selected McDermott as its proposed counsel, but for whom no time has been posted in the 12 months preceding February 29, 2024.

Closed¹ Clients

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is a Closed McDermott Client
AIG Asia Pacific Insurance Pte. Ltd.	AIG
Clifford Chance	Clifford Chance US LLP
Jones Lang Lasalle Property Consultants Pte Ltd	Jones Lang LaSalle Incorporated
Weil, Gotshal & Manges LLP	Weil, Gotshal & Manges LLP

¹ The term “closed client” means a client to whom time was posted in the 36 months preceding February 29, 2024, the date the Committee selected McDermott as its proposed counsel, but for which the client representation has been closed.